

RECAST OF THE DIRECTIVE 2002/96/EC ON WEEE**An opportunity to maximise the re-use of WEEE across Europe****Background**

This paper presents the views of Reuse and Recycling EU Social Enterprises (RREUSE), the European federation of social enterprises active in re-use and repair, on the recast of the Directive on Waste Electrical and Electronic Equipment (WEEE) published by the Commission in December 2008. RREUSE welcomes the Commission proposal and takes this opportunity to put forward a few proposals for improvement, to ensure that the professional re-use of WEEE develops across Europe.

Re-use, either as a measure of waste prevention, or as the preferred mode of waste recovery, is given the highest priority in the recently approved EU waste hierarchy. By re-using, repairing end-of-life EEE and giving products a second life, re-use helps to reduce the increasingly growing quantity of WEEE, while at the same time saving resources and energy and reducing GHG emissions. WEEE re-use and repair activities are already well established and economically viable in the EU, as the demand from consumers for second-hand EEE currently is bigger than the supply. RREUSE members alone collect over 160.000 tons of WEEE yearly in 10 Member States.

The potential for increasing re-used volumes in the future however, is huge and this could be augmented considerably, should the separate collection and sorting of reusable items be performed at the earliest stage in the WEEE management chain. Many problems arise from the implementation of the existing WEEE Directive in Europe. Solutions must be found to clarify the existing framework and to improve it with clearer targets and incentives for re-use.

Summary

The current WEEE Directive states that Member States shall give priority to the re-use of whole appliances (art.7.1). It also provides for collection and transport to be carried out in a way that optimises re-use and recycling of the components or whole appliances capable of being re-used or recycled (art. 5.4). **In practice**, these good principles were too often translated into **take-back systems** which **concentrate on low-cost recycling** in centralized plants, **thus endangering the existing local or regional re-use systems**. One of the reasons for this is the lack of incentives for Member States or producers to favour re-use in the WEEE Directive.

The recast proposal also fails to provide real drivers for re-use of EEE, as **the proposed combined target for recycling and re-use could easily be met by recycling activities alone**. We therefore recommend the directive explicitly requires a minimum 5% target for re-use for each of the categories listed in Article 11.1.

Proposals for improvement

The following will enable the achievement of much higher volumes of re-used WEEE in the future: the establishment of clear targets for re-use, the obligation to separate reusable items at first collection points, no financial discrimination favouring cheap recycling treatment over possible re-use, treatment standards ensuring an environmentally sound manual dismantling.

To maximise the re-use of WEEE, the recast of the WEEE directive should provide for the following improvements:

1. **Mandatory selection and segregation of reusable WEEE in all collection sites** at the earliest stage possible where practicable (to be included in articles 6.2 and 8.1). The selection could be carried out by experts from the accredited re-use centres described below, if covered by the financial responsibility of producers (article 12.1)
2. Introduction of a **separate 5% target for the re-use of whole appliances in each of the categories listed in article 11.1**, to ensure monitoring and provide drivers to enforce the principles of the waste hierarchy. For such a target to be achieved, adequate manual handling, transportation and storage conditions must be provided (article 6.2)
3. **Guaranteed access to separately collected WEEE for the accredited re-use centres** which carry out the selection of reusable items as well as the preparation for re-use activities. The accredited re-use centres will set up adequate monitoring and reporting systems to report on collected, prepared for re-use, recovered and exported WEEE (art. 8)
4. Secure **high-quality treatment standards** clarifying when and how hazardous substances or components should be removed: **Annex II should not be weakened** as it is needed to secure the environmental goals of the WEEE directive, the **definition of "remove"** should not allow for mechanical shredding to be used for decontamination purposes (article 3.q)
5. Oblige producers to provide, **free of charge, the necessary technical information** to accredited repair and re-use centres for all EEE products and components available on the market, and clear and permanent identification of the EEE (age and energy class), in order to maximise and ensure high quality re-use, maintenance, upgrading and refurbishment of WEEE (article 15.1)
6. Give priority to repair and re-use of WEEE inside the EU and establish simple and clear criteria to **ensure adequate monitoring and inspection mechanisms for export of reusable items** to tackle illegal WEEE exports outside the Community.